



A CONSULTATION PAPER

IMPROVEMENTS TO THE ADI / AMI SCHEMES IN NORTHERN IRELAND

23 March 2016

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Chapter 1 – Background

Introduction

The Driver & Vehicle Agency (DVA) maintains the Registers of Approved Driving Instructors (ADIs) and Approved Motorcycle Instructors (AMIs) on behalf of the Department of the Environment (DOE) under the provisions of the Road Traffic (Northern Ireland) Order 2007. (This function is due to transfer from DOE to the Department for Infrastructure in May 2016). The most recent published statistics (31 March 2015) indicate there were 1205 ADIs and 58 AMIs on the Registers at that time.

Those wishing to become an ADI or AMI must pass a three-part examination comprising a theory test, a practical driving test, and a test of their ability to instruct, before they can apply to have their name put on the Register. The three-part examination process is robust and is intended to ensure the high quality of those approved by the Registrar to provide paid driving or motorcycle instruction. An overview of the qualification process is attached at Appendix A.

Once they have passed all three parts of the qualifying examination, candidates can apply for entry to the Register. Registration lasts for four years and currently costs £240. Applicants must also meet the conditions of registration including a requirement that they are a 'fit and proper' person to be registered. All instructors are required to undergo a reassessment of their instructional ability ('check test') during their four year period of registration. The Registrar can remove an instructor's name from the Register if they fail to comply with any of the registration conditions.

This consultation document seeks views on proposals for change to the ADI / AMI schemes operating in Northern Ireland including:

- introducing provision for immediate suspension of instructor registration in certain circumstances;
- amending legislation to permit instructors to come off the Register voluntarily; and
- permitting instructors to re-enter the Register without having to re-sit the qualifying examination in certain circumstances.

You are invited to give your views, comments and ideas in respect of any aspect of this document to enable an informed decision to be taken before the relevant legislation is drafted.

With previous initiatives, DVA has on occasion established stakeholder working groups to take forward the implementation of new policies, comprised of those who have responded to consultation exercises. DVA may use the same procedure in relation to these proposals or any future consultations.

Consultees

This consultation is aimed at ADIs, AMIs, individuals training or hoping to become instructors, road safety organisations, learner drivers and their parents or guardians, and other interested parties. Notification of this consultation document has been issued to a wide range of interested parties. A list of those consulted can be found at Appendix D. If you have any suggestions of others who may wish to be involved in the consultation process, please contact Jackie Dunlop at the address below.

A draft Equality Screening Analysis form for the proposals can be found at Appendix B and a partial Regulatory Impact Assessment can be found at Appendix C. You are also invited to comment on these documents or provide any information / evidence you may have available to help inform preparation of the final versions.

Closing date for responses

The consultation period will last for a period of 12 weeks from 23 March 2016 to 15 June 2016. Responses should arrive no later than 15 June 2016 although earlier receipt would help us. Please note we are unable to consider any comments received anonymously. We will acknowledge every response.

How to respond

If you wish to respond to this consultation, please forward your written comments in either of the following ways:

E-mail: Jackie.dunlop@doeni.gov.uk

Write to: Jackie Dunlop
DVA Driver & Vehicle Standards
Business Support Unit
66 Balmoral Road
Malone Lower
Belfast
BT12 6QL

A reply form is attached at Appendix E.

If you are replying on behalf of an organisation it would be helpful if you could tell us who you are representing, the nature of the organisation, how many individuals' views are included within the response and what steps you have taken to gather those views.

Help with queries

If you have any queries or require further information about this consultation, please do not hesitate to contact Jackie Dunlop on telephone number (028) 9068 5229 or at the above address. This document may be freely reproduced and further copies are available on request.

If the papers are not in a format that suits your needs arrangements can be made for them to be provided in a suitable format.

Freedom of Information Act 2000 – Confidentiality of Consultations

The Department will publish a summary of consultation responses following completion of the consultation process. Your response and all other responses to the consultation may be disclosed on request. The Department can refuse to disclose information in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations which will give you guidance on the legal position about any information given by you in response to the consultation.

The Freedom of Information Act gives the public a right of access to any information held by a public authority, namely the Department in this case. This right of access to information includes information provided

in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility for deciding whether any information provided by you in response to this consultation, including information about your identity, should be made public or treated as confidential.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- The Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- The Department should not agree to hold information received from third parties 'in confidence' which is not confidential in nature; and
- Acceptance by the Department of confidentiality provisions must be for good reasons and capable of being justified to the Information Commissioner.

For further information about the confidentiality of responses, please contact the Information Commissioner's Office at:

Information Commissioner's Office – Northern Ireland
3rd Floor
14 Cromac Place
Belfast
BT7 2JB

Tel: (028) 9027 8757
Email to ni@ico.gsi.gov.uk

Application within the United Kingdom

This consultation seeks views on proposed changes to the ADI / AMI schemes in Northern Ireland. Separate legislation outlines the requirements for driving instruction in Great Britain.

Chapter 2 - Immediate Suspension from the Register

Conditions for entry to and retention on the Register extend beyond instructional ability alone and require that the applicant is a fit and proper person. Given that many pupils are just 17 years of age, and instructors are often placed in a one-to-one situation with pupils, a great deal of trust is placed in ADIs and AMIs by parents, guardians and pupils. The Registrar must ensure that the persons whose names appear in the Register are worthy of that trust and are fit and proper persons to have their names entered in the Register, taking into consideration an applicant's character, behaviour and standards of conduct.

Every applicant for entry to or retention on the Register is subject to an Enhanced Disclosure Check, carried out by Access NI, and it is a condition of registration that instructors must notify the Registrar immediately of any offences or convictions.

In addition, under Common Law Police Disclosure, the police may disclose relevant information to an employer or regulatory body about the arrest, charging or conviction of an individual, if they decide there is a public protection risk. This is to enable an employer or regulatory body to act swiftly to put in place measures to mitigate any danger. DVA is the regulatory body in relation to ADIs and AMIs, and the Registrar is the designated officer responsible for discharging those functions.

Currently the only measure available to the Registrar to mitigate any such danger is to terminate an instructor's registration, removing them from the Register and thus preventing them from instructing. This is a relatively slow procedure which can take 45 days or longer to complete, allowing for an instructor's right to appeal to the Department and ultimately to the Magistrate's Court.

We are seeking to introduce a means by which the Registrar would be able to act swiftly to protect pupils where the police have decided there is a public protection risk, and have provided the Registrar with information under Common Law Police Disclosure relating to that

instructor and serious criminal offences, such as a sexual or violent offence.

We wish to introduce a power that will allow the Registrar to immediately suspend an instructor's registration in these circumstances. During a period of suspension the instructor would not be permitted to undertake any paid instruction.

Q1 – Do you agree that, where the police have informed DVA that there is a serious public protection risk, the Registrar should have the power to suspend an instructor's registration as outlined above?

An instructor whose registration has been suspended would have a right of appeal against the suspension of their registration, in the first instance to the Department, and then to the Magistrate's Court.

Q2 – Do you agree that, where the Registrar has suspended an instructor's registration, the instructor should be able to appeal this decision as outlined above?

It is also proposed that the power to suspend an instructor's registration should be available to the Registrar to use in conjunction with removing them from the Register. This would mean that, where the Registrar has decided to remove an instructor from the Register, the Registrar could additionally choose to suspend that instructor's registration in order to prevent them continuing to instruct throughout the appeals process. The key test would be that the Registrar must be satisfied that the instructor would pose a significant risk to the safety of members of the public if their registration were not suspended.

Q3 – Do you agree that the Registrar should also have the power to suspend an instructor's registration in conjunction with the process of removing them from the Register?

Chapter 3 - Voluntary Removal from the Register

After qualifying as an ADI or AMI, an instructor's name is added to the Register, where it will remain until the registration either expires or is extended at the end of the four year registration period. The only other way an instructor can currently be removed is if they are removed by the Registrar for conduct, competence or other safety reasons. There is no provision in the current legislation that would enable instructors to have their name voluntarily removed, although the Registrar does occasionally facilitate such requests on an administrative basis.

We propose to change the legislation to allow the removal of an instructor's name from the Register on request. This option would not be available where an instructor has started the check test process and has not achieved a satisfactory grade, or where the Registrar is considering or has commenced the process of removal from the Register.

Q4 – Do you agree that the legislation should be changed to allow the Registrar to remove an instructor from the Register at their request?

Chapter 4 - Re-entry to the Register Following Expiry of Registration

At the end of their four year registration period an instructor can apply to renew their registration for a further four years, provided the instructor has passed a check test when required to do so, and continues to comply with any other conditions of registration, including satisfying the Registrar that they remain a “fit and proper person” to remain on the Register.

An instructor may decide not to immediately renew their registration, allowing it to lapse for up to 12 months. While their registration is lapsed, they cannot legally instruct. Provided their registration is renewed before the end of 12 months, the instructor is exempted from the requirement to pass the entry examinations, but has to meet all the other conditions of registration including paying the required fee, having the correct driving licence and being a “fit and proper person”.

Members of the ADI / AMI industry have requested a facility to let their registration lapse for longer than the current 12 months, in order to enable them to explore other lines of employment, perhaps travelling abroad to do so. There are other reasons why instructors may wish to let their registration lapse, for example family commitments or medical reasons. Instructors have stressed that the ADI / AMI qualification is hard-earned, arguing that it is harsh to have to complete the full qualification process again if more than a year has passed since their registration expired.

Options

We are considering the following options in relation to instructors wishing to rejoin the Register after their registration has lapsed, or after they have requested the removal of their name from the Register as outlined in Chapter 3. In weighing up how best to address these issues, the wishes of the industry must be balanced with ensuring that standards of instruction are maintained.

Option 1

Do nothing. There would be no change to the current position as outlined above. This option does not address the concerns raised by the instruction industry and for this reason has been discounted.

Option 2

The Driver & Vehicle Standards Agency (DVSA) maintains the ADI Register in Great Britain, and has recently published draft legislation which will enable an instructor to re-enter the ADI Register within four years of their registration lapsing, provided they pass the DVSA standards check (the equivalent test to the DVA check test), and comply with the “fit and proper person” requirements. They will be allowed three attempts at the standards check. If all three attempts are unsuccessful the former instructor will have to go through the full qualification process again.

This route will not be open to an instructor who has failed to pass a DVSA standards check or refused to undergo a standards check in their last period of registration, nor to an instructor who has been removed from the DVSA register for conduct reasons.

One downside to this approach is that if an instructor has allowed their registration to lapse for several years, therefore cannot legally instruct, it is likely to prove difficult for them to identify a suitable pupil to instruct for the check test.

Furthermore, the cost of the check test is currently covered by the registration fee, therefore DVA would have to bear the cost of up to three check tests for any instructor who wanted to re-enter the Register. Provided they pass the check test, this cost would be partly covered by the registration fee. However this registration fee is set to cover the costs incurred by DVA during the subsequent four year registration period, including the next cycle of check tests, and there would therefore be a shortfall. In addition, if a former instructor failed this test three times, they would not be permitted to return to the Register, so the cost of all three check tests would be borne in full by DVA.

DVA operates as a trading fund and is required to recover the full cost of the services it provides from the fees paid by its customers. This means

that potentially ADI or AMI registration fees would need to be increased, essentially subsidising those former instructors who wished to return to the Register but were unable to pass the check test.

For the reasons outlined above, Option 2 is not DVA's preferred option.

Option 3

Under this option, an instructor whose registration has lapsed for between one and four years would be exempted from both the theory test and driving test part of the qualification, having only to pass the test of instructional ability before they can return to the Register. They would be permitted up to three attempts at the test, and would be required to pay the relevant fee, which is currently £138, for each attempt.

In essence, while the Registrar would exempt them from Part 1 and Part 2 of the qualifying examination, confirmation would still be required that their instruction remains of an acceptable quality. With this approach the cost of the test(s) would be borne by the instructor seeking to return to instructing.

This approach has the additional advantage that there is no requirement for an instructor to bring a pupil to the test, as the role of the pupil is played by a DVA examiner.

Provided a candidate passes the test of instructional ability, they could then apply to re-enter the Register. They would have to comply with all registration requirements including paying the required fee, having the correct licence and being a "fit and proper person".

A candidate who failed all three attempts would have to undertake the entire qualification process again.

Option 3 accommodates the request of the instruction industry by allowing an instructor to let their registration lapse for a longer period than is currently possible, while ensuring that the quality of their instruction continues to meet the required standards. It also ensures that the costs associated with delivering the relevant tests are met by those instructors who choose to let their registration lapse.

We propose that an instructor who has voluntarily requested the removal of their name from the Register as outlined in Chapter 3 should also be permitted to rejoin the Register in the manner outlined above.

Option 4

As stated above, it is currently possible for an instructor to let their registration lapse for up to 12 months. An instructor who wishes to reactivate their registration within this timeframe is exempted from the requirement to pass the three tests, but must comply with all other registration requirements including paying the required fee, having the correct driving licence and being a “fit and proper person”.

Under this option, the prescribed period that an instructor’s registration is allowed to lapse would be extended from 12 months to 24 months. An instructor seeking re-registration beyond that point would be required to pass all three parts of the qualifying examination again.

We propose that an instructor who has voluntarily requested the removal of their name from the Register as outlined in Chapter 3 should also be permitted to re-enter the Register in the manner outlined above.

Option 4 gives instructors greater flexibility by enabling them to let their registration lapse for twice as long as is the current requirement. It also makes re-entry to the Register simple, as there is no test or examination involved.

Q5 – DVA considers that either Option 3 or Option 4 would achieve the required objectives. We would welcome your views on which of the above options you think would be most appropriate. Please outline the reasons for your answer.

Overview of Current ADI and AMI Schemes in Northern Ireland

ADI Qualification Process

In order to be registered as an Approved Driving Instructor (ADI), potential instructors must pass a three-part examination:

(i) ADI theory test

The ADI theory test consists of 100 multiple choice questions and a hazard perception test. Passing this test calls for a higher standard of knowledge than is required of a learner driver, and candidates must answer questions on any or all of the following subjects:

- Principles of road safety generally and their application in particular circumstances;
- Techniques of driving a car correctly, courteously and safely including control of the vehicle, road procedure, recognising hazards and taking proper action, dealing properly with pedestrians and other road users, the use of safety equipment;
- The theory and practice of learning, teaching and assessment;
- Tuition required to instruct a pupil in driving a car, including the items set out above, the correction of pupil errors, the manner of the instructor, the relationship between instructor and pupil, and simple vehicle adaptations for disabled drivers;
- Interpretation of reasons for failure given to candidate in driving test report;
- Knowledge, adequate for the needs of driving instruction, of the mechanism and design of a car;
- The Highway Code;
- The Driving Standards Agency (DSA) publication “The Official Driving Test”; and
- The DSA publication “Driving: the Essential Skills”.

(ii) The Test of Driving Ability

This test is not just a slightly more difficult ‘L’ test. It is of an advanced nature, and a very high standard of competence is

required. Candidates must show that they have a thorough knowledge of the principles of good driving and road safety and that they can apply them in practice.

(iii) The Test of Ability to Instruct

The object of this test is to assess the value of the instruction a candidate gives, and their ability to pass their knowledge on to pupils. The test is in two parts, each of which lasts about half an hour, and both parts must be passed in the same test. A candidate is asked to show their knowledge and ability by giving practical driving instruction to an examiner who will first take on the role of a pupil who is a beginner and then a pupil who is at about test standard.

The tests must be passed in this order, and all three parts must be passed within a two year period, beginning on the date on which they pass their theory test.

Three attempts at each part of the examination are allowed, but if a potential instructor fails any part of the examination three times, they cannot proceed any further and will have to wait two years from the date of their first ADI theory test before being able to begin the examination process again.

In addition to completing the three part examination, applicants must:

- Have held a full driving licence for four of the previous six years;
- Not have been disqualified from driving in the previous four years; and
- Be a fit and proper person. A criminal history check will be conducted on new applicants to determine if they are a fit and proper person. This check is undertaken when the applicant applies to take the theory test, before they are issued with a test appointment. A further check is undertaken after applicants have passed all three parts of the examination but before they are admitted on to the register of approved driving instructors.

Applicants who have passed all three parts of the examination and who meet the requirements above may, on payment of the appropriate fee, apply to be included on the register of ADIs. Their registration lasts for

four years, provided they continue to comply with the necessary requirements.

During each four year period of registration, instructors are assessed by the Driver & Vehicle Agency (DVA) to ensure their ability to instruct remains at a satisfactory standard. If an instructor fails this test of continued ability to instruct, they may have up to two further attempts. If three attempts are unsuccessful, a recommendation is made to remove the instructor from the Register.

At the end of each period of registration, instructors are required to apply to have their registration renewed for a further four years. An instructor may decide not to immediately renew their registration, allowing it to lapse for up to 12 months. While their registration is lapsed in this way, an instructor cannot legally instruct. Provided their registration is renewed before the end of 12 months, the instructor is exempted from the requirement to pass the entry examinations, but has to meet all the other conditions of registration, including paying the registration fee, having the correct driving licence, and being a 'fit and proper person'.

Trainee Licence Scheme

Once a candidate has passed both the ADI theory test and the test of driving ability, they may if they wish apply for a trainee licence which allows them to gain experience in instructing a pupil. A potential driving instructor who wishes to apply for a trainee licence must be directly supervised by an ADI for at least 20% of the time they spend instructing, and must complete daily records of instruction and supervision. The completed records must be returned to DVA for scrutiny and placed on the potential instructor's file before a second trainee licence will be issued. A trainee licence is valid for 6 months.

Approved Motorcycle Instructors (AMIs)

The qualification process for motorcycle instructors is the same with the exception of the trainee licence scheme which is only available to potential car instructors.

Current Fees

ADI / AMI theory test	£64
ADI / AMI practical driving test	£130
ADI / AMI test of ability to instruct	£138
ADI / AMI Four year registration fee	£240
ADI trainee licence (6 months)	£120

DOE SECTION 75 EQUALITY OF OPPORTUNITY SCREENING ANALYSIS FORM

Under Section 75 of the Northern Ireland Act 1998, the Department is required to have due regard to the need to promote equality of opportunity between the groups listed at **Appendix 1**. In addition, without prejudice to its obligations above, the Department is also required, in carrying out its functions relating to Northern Ireland, to have regard to the desirability of promoting good relations between persons of different religious beliefs, political opinion or racial group.

This form is intended to help you to consider whether a new or revised policy (either internal or external) or legislation will require a full equality impact assessment (EQIA). Those policies identified as having significant implications for equality of opportunity must be subject to full EQIA.

The form will provide a record of the factors taken into account if a policy is screened out, or excluded for EQIA. It will provide a basis for consultation on the outcome of the screening exercise and will be referenced in the Annual Report to the Equality Commission. Reference should be made to the outcome of the screening exercise and subsequent consultation in any submission made to the Minister.

It is important that this screening form is completed carefully and thoughtfully. Your business area's Equality Representative and the Department's Equality Team (ext 54991/37061) will be happy to assist with all aspects of the screening process and will help with the completion of the form, if required.

All screening forms should be signed off by the policy maker, approved by a senior manager responsible for the policy and sent to the Equality Team who will arrange to have them posted on the Department's website.

Policy Title:	Improvements to the Approved Driving Instructor / Approved Motorcycle Instructor schemes in Northern Ireland (2016)
Business Area:	Driver & Vehicle Agency
Contact:	Jennifer Campbell

Screening flowchart and template

Introduction

Part 1. Policy scoping – asks the Department to provide details about the policy, procedure, practice and/or decision being screened and what available evidence has been gathered to help make an assessment of the likely impact on equality of opportunity and good relations.

Part 2. Screening questions – asks about the extent of the likely impact of the policy on groups of people within each of the Section 75 categories. Details of the groups consulted and the level of assessment of the likely impact. This includes consideration of multiple identity and good relations issues.

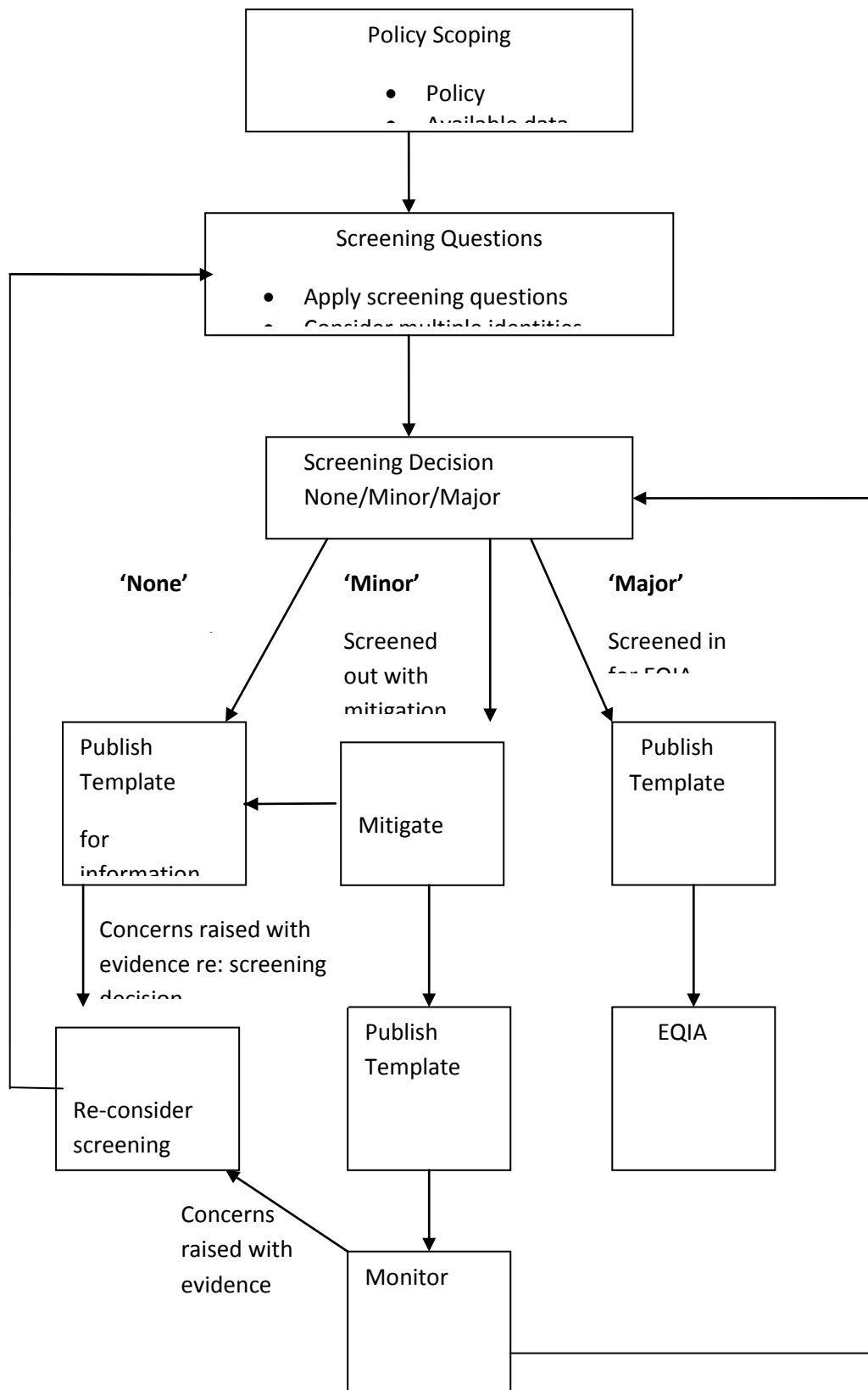
Part 3. Screening decision – guides the Department to reach a screening decision as to whether or not there is a need to carry out an equality impact assessment (EQIA), or to introduce measures to mitigate the likely impact, or the introduction of an alternative policy to better promote equality of opportunity and/or good relations.

Part 4. Monitoring – provides guidance on monitoring for adverse impact and broader monitoring.

Part 5. Approval and authorisation – verifies the Department's approval of a screening decision by a senior manager responsible for the policy. All screening templates must be signed off by the relevant policy maker, approved by a senior manager responsible for the policy and forwarded to the Department's Equality Team for quality assurance, approval and publication on the Department's website.

Part 6. Submission to the Departmental Equality Team – Contact details for the Equality Team can be found in this section.

SCREENING FLOWCHART



Part 1. Policy scoping

The first stage of the screening process involves scoping the policy under consideration. The purpose of policy scoping is to help prepare the background and context and set out the aims and objectives for the policy, being screened. At this stage, scoping the policy will help identify potential constraints as well as opportunities and will help the policy maker work through the screening process on a step by step basis.

Policy makers should remember that the Section 75 statutory duties apply to internal policies (relating to the Department's staff), as well as external policies (relating to those who are, or could be, served by the Department).

Information about the policy

Name of the policy
Improvements to the Approved Driving Instructor (ADI) / Approved Motorcycle Instructor (AMI) schemes in Northern Ireland (2016)
Is this an existing, revised or a new policy?
The consultation paper focuses on three key issues relating to ADIs and AMIs and is a combination of new and revised policies.
What is it trying to achieve? (intended aims/outcomes) (Please give clear explanation of policy aims/outcomes)
<ul style="list-style-type: none">i. to safeguard learner drivers / motorcyclists by giving the Registrar the power to suspend an instructor's registration where the Registrar is satisfied the instructor would otherwise pose a significant risk to the safety of members of the public;ii. to introduce a facility for instructors to voluntarily come off the ADI or AMI Register;iii. permitting instructors to re-enter the Register in certain circumstances without having to resit the full qualifying examination.
Are there any Section 75 categories which might be expected to benefit from the intended policy? If so, explain how.
It is anticipated that the proposed changes to enable instructors to re-enter the Register without having to re-sit the full qualifying examination may benefit persons with dependants who wish to take a break from instruction.

Who initiated or wrote the policy?
The Driver & Vehicle Agency
Who owns and who implements the policy?
The Driver & Vehicle Agency

Implementation factors

Are there any factors which could contribute to/detract from the intended aim/outcome of the policy/decision?

Yes No

If yes, are they

- financial
- legislative
- other, please specify:

Legislative – implementation of the policy will require amendment of the Road Traffic (NI) Order 2007 via a Bill in the Assembly.

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

- staff
- service users
- other public sector organisations
- voluntary/community/trade unions
- other, please specify: the driving / motorcycle instruction industry

Other policies with a bearing on this policy

- what are they?

Existing policies relating to the Registers of Approved Driving Instructors and Approved Motorcycle Instructors

- who owns them?

The Driver & Vehicle Agency

Available evidence

Evidence to help inform the screening process may take many forms. Policy makers should ensure that their screening decision is informed by relevant data.

What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Please specify details for each of the Section 75 categories. For further advice please contact Analytical Services Branch (ASB), (Gary Ewing, ext 40245) or the Equality Team (Angela Starkey, ext 54991 or Jeff Johnston, ext 37061).

Section 75 category	Details of evidence/information
Religious belief	Statistics compiled from responses to an ADI Equality Impact Assessment Questionnaire indicated that 43.3% of respondents were Protestant, 42.6% indicated that they were Catholic and the remaining 14.1% were either of another religion or no religion.
Political opinion	Not known
Racial group	Statistics compiled from responses to an ADI Equality Impact Assessment Questionnaire indicated that 99% of respondents were white.
Age	Statistics compiled from responses to an ADI Equality Impact Assessment Questionnaire indicated that 57% of respondents were aged between 35 and 54, 34% were aged 55 and over, while 9% were under 35.
Marital status	Statistics compiled from responses to an ADI Equality Impact Assessment Questionnaire indicated that 74% of respondents were married, cohabiting, civil partners or a same sex couple, 13% were single and the remainder were separated, widowed or divorced.

Sexual orientation	Not known
Men and women generally	Statistics compiled from responses to an ADI Equality Impact Assessment Questionnaire indicated that 86% of respondents were male and 14% female.
Disability	Statistics compiled from responses to an ADI Equality Impact Assessment Questionnaire indicated that 90% of respondents did not suffer from a long-standing illness, disability or infirmity.
Dependants	Statistics compiled from responses to an ADI Equality Impact Assessment Questionnaire indicated that 38% of respondents were responsible for the care of a child and 10% were responsible for the care of a person with a disability or an elderly person.

Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy/decision? Specify details for each of the Section 75 categories.

Section 75 category	Details of needs/experiences/priorities
Religious belief	There is no evidence to suggest that this section 75 group has different needs, experiences, issues or priorities in relation to these policy proposals.
Political opinion	As above
Racial group	As above
Age	As above
Marital status	As above
Sexual orientation	As above
Men and women generally	As above
Disability	As above
Dependants	The proposed change to enable instructors to re-enter the Register without having to re-sit the full qualifying examination may benefit persons with dependants, who wish to take a break from instruction.

Part 2. Screening questions

Introduction

In making a decision as to whether or not there is a need to carry out an equality impact assessment, policy makers should consider the answers to the four screening questions.

If your conclusion is **none** in respect of all of the Section 75 equality of opportunity and/or good relations categories, then you may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, you should give details of the reasons for the decision taken.

If your conclusion is **major** in respect of one or more of the Section 75 equality of opportunity and/or good relations categories, then consideration should be given to subjecting the policy to the equality impact assessment procedure.

If your conclusion is **minor** in respect of one or more of the Section 75 equality categories and/or good relations categories, then consideration should still be given to proceeding with an equality impact assessment, or to:-

- measures to mitigate the adverse impact; or
- the introduction of an alternative policy to better promote equality of opportunity and/or good relations.

In favour of a 'major' impact

- a) The policy is significant in terms of its strategic importance;
- b) Potential equality impacts are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;
- c) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- d) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there

are concerns amongst affected individuals and representative groups, for example in respect of multiple identities;

- e) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

In favour of 'minor' impact

- a) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- b) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
- c) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
- d) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

In favour of none

- a) The policy has no relevance to equality of opportunity or good relations.
- b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Taking into account the evidence presented above, consider and comment on the likely impact on equality of opportunity and good relations for those affected by this policy, in any way, for each of the equality and good relations categories, by applying the screening questions given overleaf and indicate the level of impact on the group i.e. minor, major or none.

Screening questions

1 What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? minor/major/none		
Section 75 category	Details of policy impact	Level of impact? minor/major/none
Religious belief	This policy will have no impact on equality of opportunity.	none
Political opinion	This policy will have no impact on equality of opportunity.	none
Racial group	This policy will have no impact on equality of opportunity.	none
Age	This policy will have no impact on equality of opportunity.	none
Marital status	This policy will have no impact on equality of opportunity.	none
Sexual orientation	This policy will have no impact on equality of opportunity.	none
Men and women generally	This policy will have no impact on equality of opportunity.	none

Disability	This policy will have no impact on equality of opportunity.	none
Dependants	The proposed change to enable instructors to re-enter the Register without having to re-sit the full qualifying examination may benefit persons with dependants, who wish to take a break from instruction.	Minor positive improvement
2 Are there opportunities to better promote equality of opportunity for people within the Section 75 equalities categories?		
Section 75 category	If Yes , provide details	If No , provide reasons
Religious belief		No, the policies will apply equally to instructors regardless of their section 75 category.
Political opinion		No, the policies will apply equally to instructors regardless of their section 75 category.
Racial group		No, the policies will apply equally to instructors regardless of their section 75 category.
Age		No, the policies will apply equally to instructors regardless of their section 75 category.
Marital		No, the policies will apply equally to instructors

status		regardless of their section 75 category.
Sexual orientation		No, the policies will apply equally to instructors regardless of their section 75 category.
Men and women generally		No, the policies will apply equally to instructors regardless of their section 75 category.
Disability		No, the policies will apply equally to instructors regardless of their section 75 category.
Dependants	The proposed change to enable instructors to re-enter the Register without having to re-sit the full qualifying examination may benefit persons with dependants, who wish to take a break from instruction.	

3 To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?
minor/major/none

Good relations category	Details of policy impact	Level of impact minor/major/none
Religious belief	None	None
Political opinion	None	none
Racial group	None	none

4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Good relations category	If Yes , provide details	If No , provide reasons
Religious belief		No, the policies will apply equally to instructors and potential instructors regardless of their section 75 category.
Political opinion		No, the policies will apply equally to instructors and potential instructors regardless of their section 75 category.

Racial group		No, the policies will apply equally to instructors and potential instructors regardless of their section 75 category.
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Multiple identity

Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy/decision on people with multiple identities?

(For example; disabled minority ethnic people; disabled women; young Protestant men; and young lesbians, gay and bisexual people).

Yes

No

Provide details of data on the impact of the policy on people with multiple identities. Specify relevant Section 75 categories concerned.

Part 3. Screening decision

If the decision is not to conduct an equality impact assessment, please provide details of the reasons.

This policy will impact equally on all ADIs and AMIs, and the data from the ADI Equality Impact Assessment Questionnaire has not evidenced a need to undertake a full EQIA. The policy will be subject to public consultation and any S75 issues raised will be considered.

If the decision is not to conduct an equality impact assessment the policy maker should consider if the policy should be mitigated or an alternative policy be introduced.

This has been considered and it has been agreed that the policy is justified and that no undue impact will fall on Section 75 groups, therefore no mitigation is required.

If the decision is to subject the policy to an equality impact assessment, please provide details of the reasons.

n/a

All public authorities' equality schemes must state the authority's arrangements for assessing and consulting on the likely impact of policies adopted or proposed to be adopted by the authority on the promotion of equality of opportunity. The Commission recommends screening and equality impact assessment as the tools to be utilised for such assessments. Further advice on equality impact assessment may be found in a separate Commission publication: Practical Guidance on Equality Impact Assessment.

Mitigation

When you conclude that the likely impact is 'minor' and an equality impact assessment is not to be conducted, you may consider mitigation to lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

Can the policy/decision be amended or changed or an alternative policy introduced to better promote equality of opportunity and/or good relations?

If so, give the **reasons** to support your decision, together with the proposed changes/amendments or alternative policy.

No mitigation is required.

Timetabling and prioritising

Factors to be considered in timetabling and prioritising policies for equality impact assessment.

If the policy has been '**screened in**' for equality impact assessment, then please answer the following questions to determine its priority for timetabling the equality impact assessment:-

On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Priority criterion	Rating (1-3)
Effect on equality of opportunity and good relations	
Social need	
Effect on people's daily lives	
Relevance to a public authority's functions	

Note: The Total Rating Score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment.

Is the policy affected by timetables established by other relevant public authorities?

Yes No

If yes, please provide details.

Part 4 - Monitoring

You should consider the guidance contained in the Commission's Monitoring Guidance for Use by Public Authorities (July 2007).

The Commission recommends that where the policy has been amended or an alternative policy introduced, the Department should monitor more broadly than for adverse impact.

Effective monitoring will help you to identify any future adverse impact arising from the policy which may lead to completion of an equality impact assessment, as well as help with future planning and policy development.

**Part 5 - Approval and authorisation
(to be completed by Business Area)**

Screened by:	Position/Job Title	Date
Claire Devlin	DP	23/02/2016
Approved by:		

Note: A copy of the Screening Template, for each policy screened should be 'signed off' by the policy maker, approved by a senior manager responsible for the policy and forwarded to the Department's Equality Team who will make the form available on the Department's website. Business areas should ensure that the form is made available on request.

Part 6 – Submission to Departmental Equality Team

PLEASE FORWARD AN ELECTRONIC COPY OF THE COMPLETED FORM TO: equality@doeni.gov.uk

QUERIES TO: DOE EQUALITY TEAM
8th FLOOR
GOODWOOD HOUSE
44-58 MAY STREET
BELFAST
BT1 4NN

Angela Starkey, Ext. 54991 angela.starkey@doeni.gov.uk

Jeff Johnston, Ext. 37061 jeff.johnston@doeni.gov.uk

Main Groups Relevant to the Section 75 Categories	
Category	Main Groups
Religious belief	Protestants; Catholics; people of non-Christian faiths; people of no religious belief
Political opinion	Unionists generally; Nationalists generally; members/supporters of any political party
Racial Group	White people; Chinese; Irish Travellers; Indians; Pakistanis; Bangladeshis; Black Africans; Black Caribbean people; people with mixed ethnic group
“Men and women generally”	Men (including boys); women (including girls); trans-gendered people
Marital status	Married people; unmarried people; divorced or separated people; widowed people
Age	For most purposes, the main categories are: children under 18, people aged between 18-65, and people over 65. However, the definition of age groups will need to be sensitive to the policy under consideration
“Persons with a disability”	Disability is defined as: A physical or mental impairment, which has a substantial and long-term adverse effect on a person’s ability to carry out normal day-to-day activities as defined in Sections 1 and 2 and Schedules 1 and 2 of the Disability Discrimination Act 1995
“Persons with dependants”	Persons with personal responsibility for the care of a child; persons with personal responsibility for the care of a person with an incapacitating disability; persons with personal responsibility for the care of a dependant elderly person
Sexual orientation	Heterosexuals; bi-sexuals; gays; lesbians

Partial Regulatory Impact Assessment

1. Title of Proposal

The introduction of a package of measures intended to improve the Approved Driving Instructor (ADI) and Approved Motorcycle Instructor (AMI) schemes in Northern Ireland.

2. Purpose and intended effect of measure

This partial Regulatory Impact Assessment (RIA) considers the implications of introducing a number of measures intended to improve the existing ADI / AMI schemes in Northern Ireland. The purpose of this RIA is to identify the costs which instructors will incur in meeting the new requirements and the benefits that are likely to be gained.

The costs, which are indicative at this stage, will be developed in the light of responses made to the consultation exercise about the proposed changes.

(i) The objectives

- To safeguard learner drivers / learner motorcyclists by providing the Registrar with powers to suspend an instructor from the Register where the Registrar is satisfied that the instructor would pose a significant risk if not suspended;
- To give ADIs and AMIs an option to request voluntary removal from the ADI or AMI Registers, enabling them to take a break from instruction;
- To simplify the process of rejoining the Register for ADIs and AMIs whose registration has lapsed, or who have voluntarily had their names removed from the Register.

(ii) The background and risk assessment

The Driver and Vehicle Agency (DVA) maintains the Registers of Approved Driving Instructors (ADIs) and Approved Motorcycle Instructors (AMIs) on behalf of the Department of the Environment. The most recent published statistics (31 March 2015) indicate there were 1205 ADIs and 58 AMIs on the Registers at that time.

Those wishing to become an ADI or an AMI must sit a three-part examination comprising a theory test, a practical driving test, and a test of their ability to instruct, before they can apply to have their name put on the Register. An overview of the qualification and registration process is set out in Appendix A to the consultation. This partial RIA considers a number of proposals which are intended to improve the ADI / AMI schemes in Northern Ireland. The proposals fall into three main areas:

Immediate Suspension from the Register

DVA is proposing to give the Registrar the power to suspend an instructor's registration where the police have decided there is a public protection risk and have provided the Registrar with information relating to that instructor under Common Law Police Disclosure. It is proposed that suspension would only be imposed in the most serious cases, where the Registrar needs to act swiftly to protect pupils. It is anticipated that this power would be used very infrequently. Notifications to the Registrar under Common Law Police Disclosure, or its predecessor, the Notifiable Occupations Scheme, are extremely rare. However it is important that the Registrar has the power to suspend an instructor's registration to safeguard pupils in these exceptional circumstances.

Voluntary Removal from the Register

After qualifying as an ADI or AMI an instructor's name is added to the Register where it will remain until the registration either expires or is extended at the end of the four year registration period. There is no provision in the current legislation that would enable instructors to have their name voluntarily removed, perhaps because of health issues, caring commitments, or perhaps because they are living overseas, although the Registrar does currently facilitate such requests on an administrative basis. DVA proposes to change the legislation to allow the removal of an instructor's name from the Register on request.

Re-entry to the Register following Expiry of Registration

Currently an instructor may decide not to renew their registration immediately at the end of the four year registration period. They cannot legally instruct while their registration is lapsed in this way. Provided their registration is renewed before the end of 12 months, the instructor does not need to re-sit the entry examinations, but has to meet all other conditions of registration, including paying the registration fee, having the appropriate driving licence, and being a 'fit and proper person'.

Where registration has lapsed for more than 12 months, the legislation requires that former instructors who wish to rejoin the Register must pass the entry examination.

DVA is considering a range of options that would enable instructors whose registration has lapsed for more than 12 months to rejoin the Register without having to re-sit the full three-part entry examination.

A survey of ADIs / AMIs conducted in late 2014 indicated that around 50 of the 1200 or so instructors contacted might avail of a system that would allow them to let their registration lapse for a period of time. The options outlined in the consultation paper, and set out again below, seek to balance the requests of the instruction industry, with the need to ensure that the quality of instruction is maintained.

3. Options

Immediate Suspension from the Register

Option 1 – Do Nothing

There would be no costs. However this option does not meet the objective of enabling the Registrar to act swiftly to protect pupils where the police have decided there is a public protection risk and have provided the Registrar with information relating to that instructor under Common Law Police Disclosure. For this reason this option has been discounted.

Option 2 – Seek an amendment to the Road Traffic (NI) Order 2007 in order to give the Registrar the powers to immediately suspend an approved instructor from the Register where the police have provided the Registrar with information relating to that instructor under Common Law Police Disclosure. This option achieves the stated objective of ensuring the safety of members of the public. This is DVA's preferred option.

Voluntary Removal from the Register

Option 1 – Do Nothing

There would be no costs. However this option does not meet the objective of enabling instructors to leave the Register voluntarily, and for this reason Option 1 has been discounted.

Option 2 – Seek an amendment to the Road Traffic (NI) Order 2007 introducing a power for the Registrar to remove an instructor's name from the Register, where they have requested voluntary removal. This will introduce an element of flexibility, enabling an instructor who is no longer instructing, whether for medical, family or other reasons, to ask to have their name taken off the Register, and for this reason is DVA's preferred option.

Re-entry to the Register Following Expiry of Registration

Option 1 – Do Nothing

There would be no costs to DVA. However this option does not address the concerns raised by the instruction industry in relation to rejoining the Register after their registration has lapsed. For this reason Option 1 has been discounted.

Option 2 – where an instructor's registration has lapsed, or they have requested voluntary removal, and the instructor has been off the Register for less than four years, require them to take a check test. This will align with proposed changes in Great Britain. If the instructor passes the check test, and provided they meet all the other conditions of registration (including being a fit and proper person, paying the required fee, etc), they could rejoin the Register. However with this option, DVA would have to bear the cost of between one and three check tests for each instructor who wanted to re-enter the Register. As DVA operates as a trading fund it is

required to cover the costs of its functions from the fees paid by its customers. Option 2 has therefore been discounted.

Option 3 – where an instructor’s registration has lapsed, or they have requested voluntary removal, and the instructor has been off the Register for more than 12 months but less than four years, require them to pass a test of instructional ability. They would be permitted up to three attempts at the test, and would be required to pay the relevant fee, which is currently £138, for each attempt. If the instructor passes the test of instructional ability, and provided they meet all the other conditions of registration (including being a fit and proper person, paying the registration fee, etc), they could rejoin the Register.

This option accommodates the requests of the instruction industry by allowing an instructor to let their registration lapse for a longer period than is currently possible, while ensuring that the quality of their instruction meets the required standards. It also ensures that the costs associated with delivering the required tests are met by those instructors who choose to let their registration lapse.

Option 4 - where an instructor’s registration has lapsed, or they have requested voluntary removal, and it is less than two years since the expiry of the instructor’s registration, they could apply to rejoin the Register. Provided they meet all conditions of registration, including being a fit and proper person, paying the registration fee, etc, they could rejoin the Register.

This option gives instructors greater flexibility by allowing them to let their registration lapse for twice as long as the current requirement, and makes rejoining the Register simple, as there is no test or examination involved. With this option, there are no additional costs involved for an instructor, provided they apply to rejoin the Register within the specified two year period.

4. Benefits (of the preferred options)

It is anticipated that implementation of the preferred options will have the following benefits:

Immediate Suspension from the Register

- The key benefit of introducing the immediate suspension provision as proposed in the consultation document is that it will enable the Registrar to safeguard pupils where the police have determined there is a public protection risk;
- It will protect the industry from bad publicity where an instructor is able to continue instructing while they exhaust the appeals process;
- It maintains parity with the ADI scheme in Great Britain, where the Registrar has had the powers to suspend registration since 2012.

Voluntary Removal from the Register

- The key benefit of introducing voluntary removal from the Register will be to offer greater flexibility to instructors who are no longer instructing, or who wish to take a break from instructing, whether for medical, family or other reasons.

Re-entry to the Register following Expiry of Registration

Option 3

- The key benefit of this option is that a former instructor who wants to rejoin the Register will be exempted from the requirement to pass the ADI or AMI theory test and the ADI or AMI practical test, saving between £194 and £582 in test fees alone, depending on how many attempts they need to pass;
- This option will enable a former instructor to rejoin the Register more quickly, as they will only have to pass one test, rather than three, enabling them to earn income from instruction again more quickly;
- This approach accommodates the request of the instruction industry by allowing an instructor let their registration lapse for four years, rather than one, while ensuring that the quality of their instruction continues to meet the required standards;
- With this approach, the costs associated with delivering the relevant tests are met by the instructors who opt to let their registration lapse.

Option 4

- This approach also accommodates the requests of the instruction industry by allowing an instructor to let their registration lapse for longer than is currently possible;
- With this approach, instructors will not be required to re-take any part of the qualifying examination, saving between £332 and £996 in test fees alone, depending on how many attempts they need to pass;
- This option will enable a former instructor to rejoin the Register more quickly, as will not need to re-sit any of the entry tests, enabling them to earn income from instruction again more quickly;
- Because registration is allowed to lapse for two years, the standard of instruction is likely to be maintained.

Business sectors affected

The main business sectors affected are the ADI industry and the AMI industry.

Other Impact Assessments

There are no equality, environmental, health, human rights or rural issues involved. The proposed measures will have no impact on development, sustainable or otherwise.

5. Costs

Immediate Suspension by the Registrar

There will be no compliance costs for charities or voluntary organisations. Under the proposals, where the police have notified the Registrar of relevant information relating to an instructor, the Registrar will have the power to suspend that instructor's registration; the instructor will therefore face a loss of earnings. DVA is considering introducing a compensation scheme similar to that in Great Britain, where instructors who are suspended from the Register but who are subsequently permitted to resume instructing following a successful appeal will be recompensed. The detail of this compensation scheme will be the subject of a separate consultation exercise and a separate Regulatory Impact Assessment.

Voluntary Removal from the Register

There will be no compliance costs for charities or voluntary organisations, nor will the proposal impose any additional costs on instructors.

Re-entry to the Register

There will be no compliance costs for charities or voluntary organisations. Both Option 3 and Option 4 make it easier for instructors whose registration has lapsed, or who have voluntarily asked to be removed from the Register, to rejoin the Register.

With Option 3, instructors who want to rejoin the Register should save at least £194 (the cost of one theory test and one practical test) and potentially £582, if they need all three attempts before passing.

With Option 4, the savings to instructors who wish to rejoin the Register are greater because no test is required, provided the instructor applies to rejoin within two years of their registration lapsing. In this scenario, an instructor should save between £332 and £996 in test fees alone.

6. Consultation with small business: the Small Business Impact Test

It is recognised that small business, including micro businesses (employing less than 5 people), have a considerable impact on the economy and sustainable development of Northern Ireland. In considering the costs, risks and benefits to small and micro businesses of the changes proposed in the consultation, it is envisaged that the proposals will largely reduce the burden on the instruction industry, giving individual instructors increased flexibility to take a break from instructing if they wish, and simplifying the process for rejoining the Register after a break.

The Agency welcomes comments and /or evidence on the costs, risks and benefits to the instruction industry and to any other business sectors believed to be impacted by these proposals.

7. Enforcement and Sanctions

The proposals will be incorporated into the existing ADI / AMI schemes in Northern Ireland, which are currently enforced by DVA, the Police Service of Northern Ireland and the Northern Ireland Courts and Tribunal Service.

8. Monitoring and Review

A post implementation review of the policy will be carried out 5 years after the new arrangements have been in operation.

9. Consultation

This draft partial Regulatory Impact Assessment forms part of the consultation process which is now being carried out on the proposals. The consultation paper has been issued to a wide range of interests and has also been published on the DoE website. Comments are also invited on this partial Regulatory Impact Assessment which will be further developed to take account of any comments made during the consultation.

A Final Regulatory Impact Assessment will be produced following completion of the consultation process.

List of Consultees

We have written to the following organisations informing them of this consultation exercise. The following is not an exhaustive list, but is indicative of the types of organisations this document was sent to.

Approved Driving Instructors

Approved Motorcycle Instructors

PSNI

Equality Consultees

Trade Unions

House of Lords Library

House of Commons Library

Northern Ireland Assembly Library

MPs and MEPs

MLAs

Environment Committee

Northern Ireland Party Leaders

Road Safety Organisations

Individuals/Organisations who requested further information.

Appendix E – Response form

Organisation Details					
Organisation Purpose - Please tick one box:					
ADI	AMI	Driver / motorcycle trainer / representative organisation	Government Department / Local Council	Police / Fire / MoD etc	Other: *please specify below
* Other					
Organisation purpose:					
How many views are represented by this response?					
How were the views gathered?					

Please tell us what you think of the proposals by ticking one of the boxes below. If you wish to comment further, please do so in the space provided.

Please note: DVA will only take account of any comments if you have ticked the relevant box indicating the strength of your support.

If you need more space for your comments, please continue on a separate sheet. Clearly cross-reference your comments to the relevant proposal and securely attach the sheet to the remainder of your response.

Question No 1: Do you agree that, where the police have informed DVA that there is a serious public protection risk, the Registrar should have the power to suspend an instructor's registration as outlined in the consultation?

Totally Agree	Largely Agree	Slightly Agree	Slightly Disagree	Largely Disagree	Totally Disagree

Comments:

Question No 2: Do you agree that, where the Registrar has suspended an instructor's registration, the instructor should be able to appeal this decision as outlined in the consultation?

Totally Agree	Largely Agree	Slightly Agree	Slightly Disagree	Largely Disagree	Totally Disagree

Comments:

Question No 3: Do you agree that the Registrar should also have the power to suspend an instructor's registration in conjunction with the process of removing them from the Register?

Totally Agree	Largely Agree	Slightly Agree	Slightly Disagree	Largely Disagree	Totally Disagree
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Comments:

Question No 4: do you agree that the legislation should be changed to allow the Registrar to remove an instructor from the Register at their request?

Totally Agree	Largely Agree	Slightly Agree	Slightly Disagree	Largely Disagree	Totally Disagree
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Comments:

Question No 5: DVA considers that either Option 3 or Option 4 would achieve the required objectives. We would welcome your views on which of the options you think would be most appropriate. Please outline the reasons for your answer.

Option 1 – do nothing

Option 2 – mirror DVSA approach

Option 3 – exempt returning instructors from Part 1 and Part 2 exam, but retain Part 3 requirement

Option 4 – increase the length of time an instructor can take to renew registration from 12 to 24 months

Comments:

GENERAL COMMENTS: Please use this section if you wish to make any general comments about the proposals contained in this Consultation Paper

Comments:

PARTIAL IMPACT ASSESSMENT: If you think any of the estimated costs referred to in the Partial Impact Assessment are incorrect please provide alternatives in the box below

PARTIAL IMPACT ASSESSMENT: Do you have any other comments about the Partial Impact Assessment?

Comments:

DRAFT EQUALITY SCREENING: Do you have any comments about the draft Equality Screening?

Comments:

Is there anything you particularly liked or disliked about the format of this Consultation Paper?

Comments:

Please return the completed Reply Form to:

**DVA Driver & Vehicle Standards,
Balmoral Road,
Malone Lower,
Belfast BT12 6QL**

**THE LAST DATE FOR THE RECEIPT OF RESPONSES TO THIS
CONSULTATION IS: 15 June 2016**